

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GLUCAGON-LIKE PEPTIDE-1
RECEPTOR AGONISTS (GLP-1 RAS)
PRODUCTS LIABILITY LITIGATION**

MDL No. 3094

Case No. 24-md-3094

HON. GENE E.K. PRATTER

MOTION FOR *PRO HAC VICE* ADMISSION OF TASHA GERASIMOW

Pursuant to Local Rule 83.5 and Judge Gene E.K. Pratter's General Pretrial and Trial Procedures for *Pro Hac Vice* Admissions, the undersigned counsel, Samuel W. Silver of Welsh & Recker P.C., who is admitted to practice and in good standing before the U.S. District Court for the Eastern District of Pennsylvania, respectfully moves the Court for an Order granting admission to Tasha Gerasimow, for the purpose of appearing as counsel on behalf of defendant Eli Lilly and Company, in the above-styled cause. In support of this motion, the undersigned states:

1. Ms. Gerasimow maintains an office for the practice of law at Kirkland & Ellis LLP, 333 West Wolf Point, Chicago, Illinois 60654. She is admitted to and a member in good standing of the State Bar of Illinois, the Minnesota State Court, the United States Court of Appeals, Federal Circuit, the United States District Court for the Northern District of Illinois, the United States District Court for the Northern District of Illinois Trial Bar, and the United States District Court for the District of Minnesota, as set forth in the Declaration submitted with this Motion as Exhibit A, attached.

2. Ms. Gerasimow has never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which she has been a member.

3. If Ms. Gerasimow uses Artificial Intelligence in the preparation of any complaint, answer, motion, brief, or other paper filed with the Court, she will, in a clear and plain factual statement, disclose that generative AI has been used in any way in the preparation of the filing and certify that each and every citation to the law or the record in the filing has been verified as authentic and accurate.

4. Ms. Gerasimow has read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and agrees to be bound by both sets of Rules for the duration of this case for which *pro hac vice* admission is sought.

5. If granted *pro hac vice* status, Ms. Gerasimow will in good faith continue to advise the undersigned of the current status of the case for which *pro hac vice* status has been granted, of the use of AI in preparing any paper filed with the Court, and of all material developments therein.

6. The declaration of Ms. Gerasimow is attached as Exhibit A to this Motion.

WHEREFORE, the undersigned counsel respectfully requests that this Court enter an Order for *pro hac vice* admission of Tasha Gerasimow to appear before this Court on behalf of defendant Eli Lilly and Company.

Respectfully submitted,

/s/ Samuel W. Silver
Samuel W. Silver (PA ID No. 56596)
Welsh & Recker, P.C.
306 Walnut Street
Philadelphia, PA 19106
ssilver@welshrecker.com
Tel: (267) 764-5492
Fax: (985) 617-1021

*Attorney for Defendant Eli Lilly and
Company*

Date: April 18, 2024

CERTIFICATE OF SERVICE

I, Samuel W. Silver, hereby certify that on this 18th day of April, 2024, a copy of the foregoing was filed via ECF on public docket number 24-md-3094. Notice of this filing will be sent to all counsel of record by operation of the ECF system.

/s/ Samuel W. Silver
Samuel W. Silver

Date: April 18, 2024

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GLUCAGON-LIKE PEPTIDE-1
RECEPTOR AGONISTS (GLP-1 RAS)
PRODUCTS LIABILITY LITIGATION**

MDL No. 3094

Case No. 24-md-3094

HON. GENE E.K. PRATTER

DECLARATION OF TASHA GERASIMOW

Tasha Gerasimow hereby declares as follows:

1. I am an attorney with the law firm of Kirkland & Ellis LLP.
2. I submit this declaration in support of the Motion for *Pro Hac Vice* Admission in the above-captioned matter.
3. I am a member in good standing of the State Bar of Illinois and was admitted in 2020.
4. I am admitted to the following federal jurisdictions:
 - a) United States Court of Appeals for the Federal Circuit (admitted August 10, 2020);
 - b) United States District Court for the Northern District of Illinois (admitted August 4, 2020);
 - c) United States District Court of the Northern District of Illinois Trial Bar (admitted October 1, 2021); and
 - d) United States District Court for the District of Minnesota.
5. I have never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which I have been a member.
6. If I use Artificial Intelligence in the preparation of any complaint, answer, motion, brief, or other paper filed with the Court, I will, in a clear and plain factual statement, disclose

that generative AI has been used in any way in the preparation of the filing and certify that each and every citation to the law or the record in the filing has been verified as authentic and accurate.

7. I have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and agree to be bound by both sets of Rules for the duration of the case for which *pro hac vice* admission is sought.

8. If granted *pro hac vice* status, I will in good faith continue to advise Samuel W. Silver, who has moved for my *pro hac vice* admission, of the current status of the case for which *pro hac vice* status has been granted, of the use of AI in preparing any paper filed with the Court, and of all material developments therein.

Respectfully submitted,

/s/ Tasha Gerasimow

Tasha Gerasimow

KIRKLAND & ELLIS LLP

333 West Wolf Point

Chicago, IL 60654

tasha.gerasimow@kirkland.com

Tel: (312) 862-2000

Fax: (312) 862-2200

*Attorney for Defendant Eli Lilly and
Company*

Date: April 18, 2024